

Arden Shank

Good morning. I'm Arden Shank from Neighborhood Housing and Services of South Florida in Miami. Thanks for this time to comment. We work in Miami-Dade in Broward County. We're a NeighborWorks organization. The number of services that we provide includes home buyer training and counseling. We are licensed lender, a licensed real estate brokerage company, we are a housing developer, and about a third of our 50 staff work on foreclosure prevention and loan modification.

We have been a very close partner of Fannie Mae in the last six to eight months, and opening the very first Fannie Mae Mortgage Help Center in Miami. Also, we were one of the recipients of Neighborhood Stabilization Round 2, money in the amount of over 89 million dollars to do acquisition and rehab of foreclosed properties in the north part of Miami-Dade County.

Community Groups and policy makers and Financial Institutions have relied on HMDA data to provide important and useful information about the mortgage market. However, the data is currently made available to the public. The data that is made available has not kept up with the multitude of products and services that have been available in the market since the regulation was enhanced in 2002. HMDA must be updated to provide universal reporting by all lenders. The data collected should provide for the comprehensive analysis, not only have access to credit, but also the terms of credit products provided and their impact on borrowers in our communities.

We are primarily a production organization, not a research or monitoring organization. And in that production capacity, especially in the last six to eight months, access to first mortgages for the folks that we moved to home ownership has been nearly shut down. We have needed to simply tell potential buyers who even have a contract on a house, "There's no credit." All of the--regarding the data elements to be collected, all of the creditworthiness factors that have been taken into consideration in making credit decisions should be collected to enable a compared analysis of loans for the evaluation of access to credit provided, and whether the terms of the credit offered are both responsible and sustainable. Credit scores should be collected and reported in a matter that protects the borrower privacy. There are a number of other comments that I've already submitted related to data elements to be collected or revised. So I won't go over those here.

We believe that home equity loans and reverse mortgages should also be included in HMDA. We also believe that additional data should be collected regarding mortgage and loan modifications. They are currently not reported but should be. The reporting over this data for all loan modifications would encourage proactive analysis of the lender's activity, ultimately motivating operational efficiencies in the process, and provide data for understanding neighborhood stabilization. Currently, banks are not required to collect and disclose data on loans that they purchase, yet this information may actually help banks obtain CRA credit if some of the loans were made to low or moderate income borrowers. Disclosure of this information would be helpful to determine the type of loans being exchanged and identifying gaps that nonprofit lenders like NHS may help to alleviate. There is confusion in the marketplace as to the definition of pre-approval. Although common in wholesale environment,

retail bank offices typically will not accept an application without a purchase contract. Yet, realtors will not show properties without the existence of a pre-approval letter. This contradiction of process has the effect of denying access to credit for some potential borrowers. The definition of pre-approval needs to be clarified, and the required and regulated lender behavior needs to be clarified.

In terms of finally, reporting, because we are a neighboring work organization and do significant amount of reporting, we believe that the electronic and online reporting can be--the problems of that can be overcome. Thank you.